

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 11-CR-69

v.

ROLAND FLATH,

Defendant.

**AMENDED MOTION TO ADJOURN FINAL PRETRIAL CONFERENCE,
JURY TRIAL DATES AND DEADLINE FOR SUBMISSION OF FINAL
PRETRIAL REPORT AND PLEA AGREEMENT**

The defendant, Roland Flath, by counsel, Edward J. Hunt, The Hunt Law Group S.C., moves the Court for an order for adjournment of the final pretrial conference, jury trial dates, and the deadline for submission of final pretrial report and plea agreement. This amended motion is only submitted to correct the incorrect spelling of the defendant's first name. In support of this motion, the defendant makes the following showing:

1. The plea agreement deadline for United States v. Roland Flath is Wednesday, March 7, 2012. The final joint pretrial report is due on Thursday, March 8, 2012. The pretrial conference is scheduled for Tuesday, March 13, 2012 and the jury trial is scheduled to commence on Monday, March 19, 2012.

2. Undersigned counsel agreed to assume representation of the defendant in this matter by appointment at the end of last week. Previous counsel, Brian Mullins, had withdrawn. Yesterday, February 28, 2012, Attorney Mullins and undersigned counsel met and discussed the case. He handed over his files to undersigned counsel. Undersigned counsel believes this case is complex, factually and legally. The files are voluminous. Undersigned counsel does not believe that he could provide effective assistance of counsel and be ready to comply with all deadlines set forth above in the short time that he has assumed representation. Undersigned counsel conferred by telephone with Assistant United States Attorney Penelope L. Coblentz on Monday, February 27, 2012, and she advised

undersigned counsel that she has no objection to the request for adjournment and rescheduling of the above dates.

Accordingly, the defendant requests adjournment of the final pretrial conference, jury trial dates, and the deadline for submission of final pretrial report and plea agreement. Undersigned counsel proposes either a status date before the Court or a conference call with the Court's staff and attorneys for the parties to set different dates in this matter to allow undersigned counsel to provide effective assistance of counsel. In light of all of the above, it would seem appropriate to toll any speedy trial deadlines that are in effect.

Dated at Milwaukee, Wisconsin, this 29th day of February, 2012.

Respectfully submitted,

s/Edward J. Hunt

Edward J. Hunt SBN:1005649

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